

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

RYAN JOHN LENOIR; and
LARISSA MARIE HOOVER

INDICTMENT

Case No. _____

Violations: 21 U.S.C. §§ 841(a)(1) and
846; and 18 U.S.C. §§ 922(g)(1), 924(a)(8),
924(c)(1)(A), 924(c)(1)(C)(i), and 2

COUNT ONE

**Conspiracy to Possess with Intent to Distribute and
Distribute Controlled Substances**

The Grand Jury Charges:

From in or about April 2024, and continuing through in or about November 2024,
in the District of North Dakota and elsewhere,

RYAN JOHN LENOIR and
LARISSA MARIE HOOVER

did knowingly and intentionally combine, conspire, confederate, and agree together and
with others, both known and unknown to the grand jury, to possess with intent to
distribute and distribute a mixture and substance containing a detectable amount of
methamphetamine and a mixture and substance containing a detectable amount of
fentanyl,¹ Schedule II controlled substances, in violation of Title 21, United States Code,
Sections 841(a)(1) and 841(b)(1)(C).

¹ The chemical name of fentanyl is N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]
propanamide. *See* 21 U.S.C. § 841(b)(1)(B)(vi).

OVERT ACTS

In furtherance of this conspiracy and to effect and accomplish the objects of it, one or more of the conspirators committed the following overt acts:

1. It was a part of said conspiracy that the defendants and others would and did distribute and possess with intent to distribute methamphetamine and fentanyl, both Schedule II controlled substances, in the state of North Dakota and elsewhere;
2. It was further a part of said conspiracy that one or more of the conspirators arranged the transfer of methamphetamine and fentanyl from outside the state of North Dakota into North Dakota, including by means of HOOVER's GMC Sierra pickup truck on or about April 17, 2024, and on or about June 21, 2024;
3. It was further a part of said conspiracy that the defendants and others would and did possess firearms;
4. It was further a part of said conspiracy that LENOIR robbed Victim A of methamphetamine and United States currency on or about September 30, 2024;
5. It was further a part of said conspiracy that the defendants and others would and did attempt to conceal their activities;
6. It was further a part of said conspiracy that the defendants and others would and did use United States currency in their drug transactions;
7. It was further a part of said conspiracy that the defendants and others would and did use mobile payment apps and social media in their drug transactions; and

8. It was further a part of said conspiracy that the defendants and others would and did use telecommunication facilities, including cellular telephones, to facilitate the distribution of methamphetamine and fentanyl;

In violation of Title 21, United States Code, Section 846, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT TWO

Possession of a Firearm in Furtherance of a Drug Trafficking Crime

The Grand Jury Further Charges:

On or about April 17, 2024, in the District of North Dakota,

RYAN JOHN LENOIR

did knowingly possess a firearm, namely, one CZ, Model CZ 75 SP-01 Tactical, 9mm pistol, Serial Number B107250, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, Conspiracy to Possess with Intent to Distribute and Distribute Controlled Substances, as set forth in Count One of this Indictment;

In violation of Title 18, United States Code, Sections 924(c)(1)(A), 924(c)(1)(C)(i), and 2.

COUNT THREE

Possession of a Firearm by a Convicted Felon

The Grand Jury Further Charges:

On or about April 17, 2024, in the District of North Dakota,

RYAN JOHN LENOIR,

knowing that he had previously been convicted in any court of a crime punishable by imprisonment for a term exceeding one year, to wit:

1. Robbery, a Class C felony, in violation of 18 U.S.C. §§ 2111, 1153, and 2, in the United States District Court for the District of North Dakota, Case Number 4:13-cr-186, judgment entered November 17, 2014;
2. Use and Carry of a Firearm During and in Relation to a Crime of Violence, a Class A felony, in violation of 18 U.S.C. §§ 924(c)(1) and 2, in the United States District Court for the District of North Dakota, Case Number 4:13-cr-186, judgment entered November 17, 2014; and
3. Possession of Fentanyl with Intent to Deliver, a Class B felony, in violation of N.D. Cent. Code §§ 19-03.1-23(1)(a), in the State of North Dakota, Northeast Central Judicial District, County of Grand Forks, Case Number 18-2022-CR-1345, judgment entered October 17, 2022,

did knowingly possess in and affecting commerce a firearm, that is, one CZ, Model CZ 75 SP-01 Tactical, 9mm pistol, Serial Number B107250;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(8), and 2.

COUNT FOUR

Possession of a Firearm in Furtherance of a Drug Trafficking Crime

The Grand Jury Further Charges:

On or about November 8, 2024, in the District of North Dakota,

RYAN JOHN LENOIR

did knowingly possess a firearm, namely, one privately manufactured Polymer 80, 9mm pistol, no serial number, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, Conspiracy to Possess with Intent to Distribute and Distribute Controlled Substances, as set forth in Count One of this Indictment;

In violation of Title 18, United States Code, Sections 924(c)(1)(A), 924(c)(1)(C)(i), and 2.

FORFEITURE NOTICE

Upon conviction of one or more of the offenses alleged in this Indictment,

RYAN JOHN LENOIR and
LARISSA MARIE HOOVER

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d), Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461(c), all firearms, ammunition, and other personal property involved in the commission of the offense, including, but not limited to, the following:

- One CZ, Model CZ 75 SP-01 Tactical, 9mm pistol, Serial Number B107250;
- One privately manufactured Polymer 80, 9mm pistol, no serial number;

and all right, title, and interest in any of the property constituting or derived from proceeds obtained directly or indirectly as a result of the violations of Title 21, United States Code, Sections 841 and 846, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violation, including, but not limited to one 2015 GMC Sierra K1500 SLE, bearing vehicle identification number 3GTU2UEC9FG227052 seized from them on or about November 8, 2024.

A TRUE BILL:

/s/ Foreperson
Foreperson

/s/ Jennifer Klemetsrud Puhl
JENNIFER KLEMETSRUD PUHL
Acting United States Attorney

JTR/ak